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December 21, 2004

***Via electronic filing***

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: South Canaan Cellular Communications Company, LP  
CC Docket No. 94-102  
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits updated information in support of its request for waiver of Section 20.18(d) of the Commission's Rules (filed August 1, 2003). As indicated by the additional information provided herein, the public interest will be served by grant of the requested relief.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,

  
Sylvia Lesse

Counsel for South Canaan  
Cellular Communications Company, LP

cc: John Muleta, Chief, Wireless Telecommunications Bureau (via e-mail)  
David Solomon, Chief, Enforcement Bureau (via e-  
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division  
Stanley Wiggins, Public Safety & Critical Infrastructure Division  
Best Copy & Printing, Inc.  
Mr. Bernie Swartwood, Pike County Communications

**SOUTH CANAAN CELLULAR COMMUNICATIONS COMPANY, LP.**  
**E911 PHASE II INTERIM IMPLEMENTATION REPORT**  
**FOR TIER III CARRIERS**  
**Supplemental Interim Report, December 2004**

South Canaan Cellular Communications Company, L.P. ("South Canaan" or "Company"), provides the following information to update the Commission's records<sup>1</sup> as a supplement to its quarterly reports.

South Canaan, a small and rural wireless carrier, has been engaged in a focused upgrade program designed to convert its analog system to a digital, CDMA technology which will support a handset solution to Phase II E-911 information delivery. As noted in its previous reports, South Canaan provides Phase I service to Pike County, Pennsylvania and has received a valid Phase II request from the PSAP serving that county.<sup>2</sup> Its request for a limited and temporary waiver of Phase II E-911 obligations relates to the Pike County request, and South Canaan has kept the Pike County PSAP apprised of its progress in meeting its obligations.

Given that its ability to support Phase II E-911 functionality is dependent upon its technology transition, South Canaan submits this interim report to update information regarding its conversion progress and plans.

As previously reported, the Company has purchased and installed upgrades to its Lucent switch so that it will now support digital signals.<sup>3</sup> Having completed the digital conversion of five of its six sites in Pike County, it is now able to concentrate on its most remote site at Ledgesdale, and has initiated the purchase order process for the equipment necessary to convert this last site. The Company now expects its digital conversion in Pike County to be complete by January 15, 2005 (weather permitting). In addition, the Company has executed an agreement with the location database service bureau, Intrado, Inc., and has placed an order with Commnet for the necessary software interface to deliver Phase II E-911 information to the PSAP.

Completion of conversion will enable the Company to initiate an aggressive education campaign for Pike County subscribers.<sup>4</sup> Targeting mailings to Pike County subscribers will encourage equipment change-out to take advantage of the advanced features available through CDMA technology, including enhanced safety features. A New Year campaign will educate the identified 82% of the Company's Pike County customer base with non-compliant phones

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<sup>1</sup> On August 1, 2003, South Canaan requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, South Canaan committed to providing quarterly progress reports. On November 10, 2003, South Canaan supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Wavier of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"). The Company filed progress reports on January 15, April 15, July 15, and October 15, 2004. The instant report serves as the Company's sixth progress report.

<sup>2</sup> The only other county served by South Canaan, Wayne County, Pennsylvania, has submitted neither a Phase I nor a Phase II E-911 request.

<sup>3</sup> See Supplement at 2.

<sup>4</sup> Until digital technology is fully activated, promotion would lead to needless customer confusion.

regarding the benefits of digital technologies. Currently, the Company sells only compliant phones, and approximately 50% of the system's users, TracFone resale customers, are 100% compliant.

# DECLARATION OF CAROLYN C. COPP

I, Carolyn C. Copp, President of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "Supplemental Interim Report – December, 2004" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

21 Dec 2004

Date

Carolyn C. Copp  
Carolyn C. Copp